
AODA Integrated Accessibility Standards

Responsibility: Human Resources Manager

Date of Original Policy: December 1, 2011

Date of First Revision:

Supercedes:

Purpose and Policy Statement

White Oaks is committed to creating an inclusive culture across the organization by preventing and removing barriers for persons with disabilities to afford equal opportunities of programs and services.

Where it is not possible to remove barriers, White Oaks will make efforts to accommodate persons with disabilities in a timely, effective, and suitable manner.

This policy is intended to meet the requirements of the Integrated Accessibility Standards (IAS), (Regulation 191/11) under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA). The regulation establishes standards to address barriers that persons with disabilities face in the areas of *information and communications, employment, and transportation*.

White Oaks Conference Resort & Spa supports the principles of the AODA and the Integrated Accessibility Standards Regulation.

As a designated large private sector organization, White Oaks has a goal is to ensure accessibility for our team members and the public we serve. The purpose of this policy is to ensure that White Oaks Conference Resort & Spa complies with the Government of Ontario's integrated accessibility standards.

Application and Scope

This policy applies to White Oaks team members, students, and volunteers.

Procedure

White Oaks will develop policies, procedures and practices which address integration, independence, dignity and equal opportunity, to comply with the legislation requirement prescribed under the Accessibility for Ontarians with Disabilities Act (AODA) 2005, and to promote accessibility.

Definitions

Barrier: anything that prevents a person with a disability from fully participating in one or more aspects of society, including a physical barrier, an architectural barrier, information or communications barrier, attitudinal barrier, technological barrier, policy or practice.

Standard: according to the AODA, sets out what a person or organization must do to achieve accessibility for persons with disabilities to whom the standard applies.

Communication supports: may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Accessible formats: may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

“Disability” means:

- a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device
- b) a condition of mental impairment or a developmental disability,
- c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d) a mental disorder, or
- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

Feedback: any comments, compliments, suggestions, or complaints provided to White Oaks Conference Resort & Spa by its customers.

Internet website: means a collection of related web pages, images, videos, or other digital assets that are addressed relative to a common Uniform Resource Identifier and is accessible to the public.

New internet website: means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

Information: includes data, facts and knowledge that exists in any format, including text, audio, digital or images and conveys meaning.

Kiosk: means an interactive electronic terminal, including a point of sale device, intended for public use that allows users to access one or more services or products.

General Requirements

Integrated Accessibility Standards Commitment

White Oaks will maintain a multi-year Accessibility Plan outlining its phased strategy to address the current and future requirements of the AODA and the IASR. White Oaks will review and update the Accessibility Plan at least once every five (5) years and will post the Accessibility Plan on its website. Upon request, White Oaks will provide a copy of the Accessibility Plan in an accessible format.

Accessibility Policies

Through this AODA Integrated Accessibility Standards policy and related accessibility policies, White Oaks confirms our commitment to meet the needs of persons with disabilities in a timely manner.

White Oaks will make these documents publicly available and provide them in an accessible format upon request.

Accessibility plans

White Oaks will maintain a multi-year accessibility plan and review and update it once every five years. White Oaks will post the plan on its website and provide it in accessible format upon request.

White Oaks will file an annual status report on the progress of measures taken to implement its strategy, post the report on its website and provide it in accessible format upon request.

Procuring or acquiring goods, services or facilities

White Oaks will incorporate accessibility features and criteria when procuring or acquiring goods, services or facilities, except where it is not practicable to do so. Where it is deemed not practicable to do so, White Oaks Conference Resort & Spa will provide an explanation upon request.

Self-service kiosks

White Oaks will incorporate accessibility features when designing, procuring or acquiring self-service kiosks, except where not practicable to do so. Any current kiosks will be reviewed upon updating or procuring of future self-service kiosks.

Training team members and volunteers

White Oaks will provide training for our team members and volunteers on accessibility as it relates to their specific roles. White Oaks trains every person as soon as practicable after being hired and provide training in respect of any changes to the policies.

Information and Communication Standards

Customer Feedback

White Oaks Conference Resort & Spa will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities and will notify the public about the availability of accessible formats and communications supports as soon as practicable, upon request.

Accessible Formats and Communication Supports

Upon request, White Oaks will provide or arrange for accessible formats and communication supports for persons with disabilities in a timely manner that takes into account each person's accessibility needs.

When an accessible format or communication support is requested, White Oaks Conference Resort & Spa will consult with the person making the request to determine the suitability of an accessible format or communication support. White Oaks will endeavor to provide this in a reasonable amount of time and at a cost that is no more than the regular cost charged to other persons.

Accessible Websites and Web Content

White Oaks Conference Resort & Spa will make its internet websites and web content conform to World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, except where not practicable to do so.

Employment Standards Overview

White Oaks Conference Resort & Spa's policies and practices are intended to build an inclusive and accessible work environment free from discrimination and harassment.

Recruitment

White Oaks will notify its team members and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

Recruitment, Assessment or Selection Process

White Oaks will notify job applicants when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request, in relation to the materials or processes to be used in the job assessment or selection process.

If a selected applicant requests an accommodation, White Oaks will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

Notice to Successful Applicants

When making offers of employment, White Oaks will notify the successful applicant of its policies for accommodating team members with disabilities.

Informing Employees of Supports

White Oaks will continue to inform its team members of its policies (and any updates) used to support team members with disabilities, including policies on the provision of job accommodations that take into account a team members accessibility needs due to disability. This information will be provided to new team members as soon as practicable after commencing employment.

Accessible Formats and Communication Supports for Team Members

Upon the request of a team member with a disability, White Oaks will consult with the team member to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform the team members job, and information that is generally available to other team members. In determining the suitability of an accessible format or communication support, White Oaks will consult with the team member making the request.

Workplace Emergency Response Information

White Oaks will provide individualized workplace emergency response information to team members who have a disability, if the disability is such that the individualized information is necessary, and if White Oaks is made aware of the team members need for accommodation due to the team members disability. White Oaks will provide this information as soon as practicable after becoming aware of the team members need for accommodation.

Where the team member requires assistance, White Oaks will, with the consent of the team member, provide the workplace emergency response information to the person designated by White Oaks to provide assistance to the team member.

White Oaks will review the individualized workplace emergency response information developed for the team member when the team member moves to a different department within White Oaks when the team members overall accommodations needs or plans are reviewed, and when White Oaks reviews its general

Documented Individual Accommodation Plans

White Oaks will maintain a written process for the development of documented individual accommodation plans for team members with disabilities. If requested, information regarding accessible formats and communications supports provided will be included in individual accommodation plans. In addition, the accommodation plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

Return to Work Process

White Oaks maintains a documented return to work process for its team members who have been absent from work due to a disability and who require disability-related accommodation in order to return to work. The return-to-work process outlines the steps White Oaks will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return-to-work process will not replace or override any other return to work process created by or under any other statute (such as the Workplace Safety Insurance Act, 1997).

Performance Management, Career Development and Advancement & Redeployment

White Oaks will take into account the accessibility needs of team members with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement opportunities to team members, or when redeploying team members.

Transportation Standards Overview

This procedure addresses the accessible transportation standards requirements of Ontario Regulation 191/11 for the Integrated Accessibility Standards Regulation under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

This procedure applies to the provision of transportation services, for our guests, team members and volunteers.

Reporting

White Oaks will file an accessibility report regarding its compliance with the IASR, annually or at such other times as specified under the AODA. All filed accessibility reports will be made available to the public, upon request.

Questions

If anyone has a question about this Policy, or if the purpose of the Policy is not understood, an explanation will be provided by contacting us by mail at

White Oaks Resort & Spa
253 Taylor Road,
Niagara on the Lake
L0S 1J0

Any personal information provided in the feedback process will be handled in accordance with the White Oaks privacy policies.

Compliance

Compliance with this policy is mandatory and any violations of this policy will be treated seriously and may result in disciplinary actions, up to and including an unpaid suspension of employment and/or termination of employment and/or legal action, as applicable depending on the severity of the incident.

References and Forms

- *Ontario Human Rights Code*
- *Accessibility for Ontarians with Disabilities Act, 2005*
- *Integrated Accessibility Standards Regulation 191/11*

Further interpretation of this policy is the responsibility of the Human Resources Manager. The Company reserves the right to make, modify, revoke, suspend, terminate, or change any policy or procedure, in whole or in part, at any time. Exceptions can be made to this policy as deemed necessary by the Chief Executive Officer.

